

EXHIBIT C

DECLARATION OF ELIZABETH C. HELM

I, Elizabeth C. ("Kate") Helm, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 21 and am a resident of the state of Georgia. I have personal knowledge of the facts and circumstances set forth in this Declaration and, if called upon to do so, I could and would competently testify thereto.

2. I am a lawyer licensed to practice in the State of Georgia. I am a partner at Nelson Mullins Riley & Scarborough, LLP, and I am one of the lawyers representing C.R. Bard, Inc. and Bard Peripheral Vascular ("BPV") in the Bard IVC Filters Products Liability Litigation.

3. I am the lawyer for the Bard defendants who has participated in the meet and confer process with plaintiffs' counsel regarding plaintiffs' challenges to the Bard privilege logs.

4. I am very familiar with the log entries addressed and the approximately 132 entries that remain in dispute between the parties from the initial group of documents addressed.

5. I have reviewed those entries and the documents referenced. Almost all of the documents/entries at issue (119 entries) are communications to or from BPV employees and the Bard in-house or retained lawyers seeking or receiving legal advice about matters relating to the IVC filters. Almost all of the documents are emails.

6. The remaining entries are:

- a. 6 of the entries are work product communications to or from Dr. Lehmann, or discussing his work in late 2004/early 2005 at the request of the Bard Legal Department, and about which the Court has previously ruled.
- b. One additional entry is between in-house counsel and Dr. Lehmann regarding a later evaluation of the filter.
- c. 2 of the entries are communications between paralegals in the Bard legal department responsible for the filter litigation.
- d. 2 of the entries are communications between in-house counsel and C.R. Bard

executives regarding litigation in which the company was involved

- e. 2 of the entries are redacted documents. The redacted portions are communications or information from in-house counsel that are unrelated to BPV or the IVC filter litigation.

Dated: June 20, 2016


Elizabeth C. Helm